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ATTORNEY FOR RANDI L. CRUM

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:	§	
	§	
RALPH LYLE CRUM,	§	CASE NO.2-08-20297-RLJ-7
	§	
DEBTOR.	§	

**RANDI L. CRUM'S RESPONSE TO TRUSTEE'S  
OBJECTIONS TO DEBTOR'S CLAIMED EXEMPTIONS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Randi L. Crum, a creditor and party in interest in the above referenced bankruptcy proceeding and files this her Response to Trustee's Objections to Debtor's Claimed Exemptions. In support of this Response Randi Crum would show the Court as follows:

1. Randi L. Crum admits the allegations contained in Paragraph 1 of the Trustee's Motion.
2. Randi L. Crum admits the allegations contained in Paragraph 2 of the Trustee's Motion.
3. Randi L. Crum admits the allegations contained in Paragraph 3 of the Trustee's Motion.

4. Randi L. Crum denies the allegations contained in Paragraph 4 of the Trustee's Motion. The Debtor has claimed a \$10,000 general exemption out of \$60,000 in furniture and furnishings located at 25 Fenton Hill Road, Weston, Connecticut, and a \$20,000 exemption in a bronze sculpture Sun and Moon, located at 25 Fenton Hill Road, Weston Connecticut. However, the Debtor and Debtor estate have no claim to any of the household furniture and furnishings or the bronze sculpture located at 25 Fenton Hill Road, Weston, Connecticut, listed in the Debtor's schedules, because these properties were awarded to Randi Crum as her "sole property" by a divorce decree before the Debtor's bankruptcy was filed. Specifically, on April 8, 2008, the Memorandum of Decision of the Superior Court, Judicial District of Stamford, Connecticut, in Cause No. FST FA 06 4010407, styled *Randi Crum v. Ralph Crum*, provided that the Plaintiff, Movant here, was to "retain all the remaining assets in her name as her sole property **as well as the contents of the Weston Home.**" A copy of this Memorandum is attached as an exhibit hereto. Therefore, the Debtor has no interest in the household furniture and furnishings or the Bronze sculpture on which to make a claim of exemption, and that exemption should be denied. Additionally, even if the estate had had some rights in the personal property which is in the possession of Randi Crum, Randi Crum has a right to offset or recoup the value of these properties against the monies she is owed by the Debtor, pre or post-petition, for the payment of child support and alimony under the April 8, 2008 Memorandum of Decision.

5. Randi Crum admits the Debtor has claimed an exemption of \$304,062.23 in retirement and IRA accounts. Randi Crum is without sufficient information to admit or deny the remainder of the allegations in Paragraph 5 of the Trustee's objections. Randi Crum does not support the Trustee's Objection to Exemption of the Debtor's Retirement Accounts or IRA's except

that those accounts and IRA's are not exempt from any child support obligations and liens which may be held or obtained by Randi Crum for the benefit of her two children under Texas Property Code § 42.005.

Respectfully submitted,

/s/ Coleman Young

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ATTORNEY FOR RANDI L. CRUM

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing instrument was served upon the following this 7<sup>th</sup> day of August, 2008, addressed as follows:

Mr. Van Northern NORTHERN LAW FIRM 112 W. 8 <sup>th</sup> Street, Suite 400 Amarillo, Texas 79101	Via Electronic Notice <input checked="" type="checkbox"/> Certified Mail, Return Receipt Requested <input type="checkbox"/> United States Regular Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Via Facsimile Transmission <input type="checkbox"/> Via Hand-Delivery <input type="checkbox"/>
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Mr. Kent David Ries 600 S. Tyler, Suite1300 Box 12058 Amarillo, Texas 79101	Via Electronic Notice <input checked="" type="checkbox"/> Certified Mail, Return Receipt Requested <input type="checkbox"/> United States Regular Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Via Facsimile Transmission <input type="checkbox"/> Via Hand-Delivery <input type="checkbox"/>
United States Trustee 1100 Commerce Street, Room 976 Dallas, Texas 75242-1496	Via Electronic Notice <input checked="" type="checkbox"/> Certified Mail, Return Receipt Requested <input type="checkbox"/> United States Regular Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Via Facsimile Transmission <input type="checkbox"/> Via Hand-Delivery <input type="checkbox"/>

/s/ Coleman Young  
Coleman Young